



MULLEN  
COUGHLIN<sub>LLC</sub>  
ATTORNEYS AT LAW

JUN 5 12 28 PM '23  
NH DEPT OF JUSTICE

1266 E. Main Street, Soundview Plaza,  
Suite 700 R  
Stamford, CT 06902

May 31, 2023

**VIA U.S. MAIL**

Consumer Protection Bureau  
Office of the New Hampshire Attorney General  
33 Capitol Street  
Concord, NH 03301

**Re: Notice of Data Event**

To Whom It May Concern:

We represent Dollar Bank, FSB ("Dollar Bank") located at 20 Stanwix Street Pittsburgh, PA 15222, and are writing to notify your office of an incident impacting Standard Bank systems, that may affect the security of certain personal information relating to five (5) New Hampshire residents. Standard Bank merged with Dollar Bank and for this reason, Standard Bank's systems are no longer operational which is why Dollar Bank is communicating this message to you. By providing this notice concerning Standard Bank's systems, Dollar Bank does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

**Nature of the Data Event**

**It is important to note that this incident happened prior to the merger and Standard Bank operating systems were, at all times, separate both physically and electronically from Dollar Bank's systems. Dollar Bank customers and systems were never impacted by this incident.**

On February 4, 2023, we determined that there was unauthorized access to certain Standard Bank systems that supported former Standard Bank customers. Upon learning of the incident, we activated our incident response protocols and mobilized to contain the incident and protect Standard Bank systems and data. Those steps included taking all Standard Bank systems offline and taking other measures to help protect systems and data. We also worked with law enforcement and engaged external forensic specialists to investigate the nature and scope of the incident.

The investigation determined that between March 24, 2021 and February 4, 2023, an unauthorized third party gained intermittent access to certain Standard Bank systems. In addition, our response and investigation activities included confirming the security of bank systems, reviewing the contents of relevant data for sensitive information, and notifying applicable regulatory authorities.

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The information that could have been subject to unauthorized access includes

**to New Hampshire Residents**

On or about May 31, 2023, Dollar Bank provided written notice of this incident to five (5) New Hampshire residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

**Other Steps Taken and To Be Taken**

Upon discovering the event, Dollar Bank moved quickly to investigate and respond to the incident, assess the security of Dollar Bank systems, and identify potentially affected individuals. Further, Dollar Bank notified law enforcement regarding the event. Dollar Bank is providing access to credit monitoring services for twelve (12) months, through Kroll Essential Monitoring, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Dollar Bank is providing impacted individuals with guidance on how to better protect against identity theft and fraud. Dollar Bank is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

Dollar Bank is providing written notice of this incident to relevant state regulators, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion.

**Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at

Very truly yours,

Gregory J. Bautista of  
MULLEN COUGHLIN LLC

GJB/asm  
Enclosure

# **EXHIBIT A**

<<Date>> (Format: Month Day, Year)

<<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>  
 <<address\_1>>  
 <<address\_2>>  
 <<city>>, <<state\_province>> <<postal\_code>>  
 <<country>>

<<b2b\_text\_1 (Variable Subject header)>>

Dear <<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>,

We are writing to notify you about a security incident regarding the privacy of your personal information, while you were a customer of Standard Bank. This letter explains what happened, our response to the incident, and provides information and steps that may be helpful in protecting your information.

Standard Bank merged with Dollar Bank and for this reason, Standard Bank's systems are no longer operational which is why Dollar Bank is communicating this message to you.

**It is important to note that this incident happened prior to the merger and Standard Bank operating systems were, at all times, separate both physically and electronically from Dollar Bank's systems. Dollar Bank customers and systems were never impacted by this incident.**

Here is what happened and how it affects you as a former Standard Bank customer.

What happened?	<p>On February 4, 2023, we determined that there was unauthorized access to certain Standard Bank systems that supported former Standard Bank customers. Upon learning of the incident, we activated our incident response protocols and mobilized to contain the incident and protect Standard Bank systems and data. Those steps included taking all Standard Bank systems offline and taking other measures to help protect systems and data. We also worked with law enforcement and engaged external forensic specialists to investigate the nature and scope of the incident.</p> <p>The investigation determined that between March 24, 2021 and February 4, 2023, an unauthorized third party gained intermittent access to certain Standard Bank systems. In addition, our response and investigation activities included confirming the security of bank systems, reviewing the contents of relevant data for sensitive information, and notifying applicable regulatory authorities.</p>
What information was involved?	<p>The investigation determined the following types of information may have been impacted by this incident: &lt;&lt;b2b_text_2 (name and data elements)&gt;&gt;. Currently, we have no evidence of misuse of your personal information.</p>
What are we doing?	<p>Data privacy and security are extremely important to us. To help protect customer data, as an added precaution, we are offering complementary 12 months of identity monitoring services through Kroll.</p> <p>We remain committed to maintaining the security of your personal information. Although Dollar Bank customers and systems were not impacted by this incident, as part of our ongoing commitment to the privacy of information in our care, Dollar Bank reviews policies, procedures and processes related to the storage and access of personal information on an ongoing basis.</p>

What can you do?	<p>If you would like to activate the identity monitoring services being offered through Kroll, you must activate by following the attached activation instructions as we cannot activate them on your behalf. While we will cover the cost of these services, you will need to complete the activation process. Activation instructions are attached to this letter.</p> <p>In addition, please continue to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your credit reports for suspicious activity or errors. You may also review the information contained in the attached "Steps You Can Take to Help Protect Your Personal Information."</p>
For more information	<p>We have established a dedicated customer assistance line through our third-party partner, Kroll, that can answer specific questions about this incident and help you activate the identity monitoring services being offered.</p> <p>Please call &lt;&lt;TFN&gt;&gt;, Monday through Friday, excluding major U.S. holidays, during the hours of 9:00a.m. to 6:30p.m., Eastern time, and Saturday through Sunday during June during the hours of 9:00a.m. to 6:30p.m., Eastern time.</p>

We apologize for any inconvenience or concern this event may cause. As a regional bank that values the people and communities we serve, we hope that the information provided in this letter is helpful and demonstrates our ongoing commitment to serving and supporting you.

Sincerely,

Andy Hasley  
Chief Banking Officer



## STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

### **Activate Identity Monitoring**

To help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide identity monitoring at no cost to you for one year. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Web Watcher, Public Persona, Quick Cash Scan, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration.

Visit <https://enroll.krollmonitoring.com> to activate and take advantage of your identity monitoring services.

You have until <<b2b\_text\_6 (activation date)>> to activate your identity monitoring services.

Membership Number: <<Membership Number s\_n>>

For more information about Kroll and your Identity Monitoring services, you can visit [info.krollmonitoring.com](http://info.krollmonitoring.com).

Additional information describing your services is included with this letter.

### **Monitor Your Accounts**

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order your free credit report, visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your credit report.

Consumers have the right to place an initial or extended "fraud alert" on a credit file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer's credit file. Upon seeing a fraud alert display on a consumer's credit file, a business is required to take steps to verify the consumer's identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a "credit freeze" on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer's express authorization. The credit freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a credit freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. To request a security freeze, you will need to provide the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to five years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver's license or ID card, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if you are a victim of identity theft.

Should you wish to place a credit freeze, please contact the three major credit reporting bureaus listed below:

<b>Equifax</b>	<b>Experian</b>	<b>TransUnion</b>
<a href="https://www.equifax.com/personal/credit-report-services/">https://www.equifax.com/personal/credit-report-services/</a>	<a href="https://www.experian.com/help/">https://www.experian.com/help/</a>	<a href="https://www.transunion.com/credit-help">https://www.transunion.com/credit-help</a>
888-298-0045	1-888-397-3742	1 (800) 916-8800
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

### **Additional Information**

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; [www.identitytheft.gov](http://www.identitytheft.gov); 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

*For District of Columbia residents*, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, DC 20001; 202-727-3400; and [oag.dc.gov](http://oag.dc.gov).

*For Maryland residents*, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov/>. Dollar Bank is located at 20 Stanwix Street, 18th Floor, Pittsburgh, PA 15222.

*For New Mexico residents*, you have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from violator. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting [www.consumerfinance.gov/f/201504\\_cfpb\\_summary\\_your-rights-under-fcra.pdf](http://www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf), or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

*For New York residents*, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov/>.

*For North Carolina residents*, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and [www.ncdoj.gov](http://www.ncdoj.gov).

*For Rhode Island residents*, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; [www.riag.ri.gov](http://www.riag.ri.gov); and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are [#] Rhode Island residents impacted by this incident.



# KROLL

## TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll:

### **Single Bureau Credit Monitoring**

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

### **Web Watcher**

Web Watcher monitors internet sites where criminals may buy, sell, and trade personal identity information. An alert will be generated if evidence of your personal identity information is found.

### **Public Persona**

Public Persona monitors and notifies when names, aliases, and addresses become associated with your Social Security number. If information is found, you will receive an alert.

### **Quick Cash Scan**

Quick Cash Scan monitors short-term and cash-advance loan sources. You will receive an alert when a loan is reported, and you can call a Kroll fraud specialist for more information.

### **\$1 Million Identity Fraud Loss Reimbursement**

Reimburses you for out-of-pocket expenses totaling up to \$1 million in covered legal costs and expenses for any one stolen identity event. All coverage is subject to the conditions and exclusions in the policy.

### **Fraud Consultation**

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

### **Identity Theft Restoration**

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.